

BakerHostetler

Baker&Hostetler LLP

1801 California Street
Suite 4400
Denver, Colorado 80202-2662

T 303.861.0600
F 303.861.7805
www.bakerlaw.com

Casie D. Collignon
direct dial: 303.764.4037
ccollignon@bakerlaw.com

April 21, 2023

VIA ECF

Honorable Kenneth M. Karas
United States District Judge
Southern District of New York
300 Quarropas Street, Courtroom 521
White Plains, New York 10601

Re: *Finn v. Empress Ambulance Services, Inc. d/b/a Empress EMS, Case No. 7:22-cv-08101-KMK (the "Finn Action")*

Dear Judge Karas:

As you know, we represent Defendant Empress Ambulance Service, LLC ("Empress") in the above-captioned *Finn* Action. Empress writes jointly with Plaintiff John Finn ("Plaintiff") pursuant to the Court's November 14, 2022 Order [Dkt. No. 17] requiring the parties to the *Finn* Action to submit joint status reports to the public docket providing updates on the progress of settlement negotiations every 14 days. The twelfth status report is due today, April 21, 2023.

Since the parties' previous status report, they have continued to meet and confer and conduct diligent settlement negotiations. Specifically, the parties have finalized a plan to avoid jurisdictional objections and have agreed to the key points of the settlement agreement. The parties are now just working to finalize the small details. Additionally, the parties are continuing to work with the settlement administrator and notice expert to draft the long and short form notice, claim form, settlement website content, and telephonic procedures.

The parties are very close to finalizing the settlement agreement. Therefore, we respectfully request that the Court continue to stay the later-filed actions during this process. The parties will

Honorable Kenneth M. Karas

April 21, 2023

Page 2

continue working on the settlement during the next two weeks and, in accordance with the Court's November 14, 2022 Order, will provide another status update on May 5, 2023.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Casie D. Collignon". The signature is fluid and cursive, with a long, sweeping horizontal stroke at the end.

Casie D. Collignon

cc: All counsel of record (via ECF)